

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

In Re: JACALYN NADINE ) Case No. 22-50174  
QUINTERO-MENDOZA )  
Debtor )

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

**COMES NOW** Debtor, Jacalyn Quintero-Mendoza by and through Counsel, and for this Response to the Trustee's Motion to Dismiss states that she fell behind on payments because she missed several days of work while taking her disabled daughter to multiple appointments. In addition, she needed to help put tires on her daughter's car. Debtor made a payment of \$653.00 through TFS on January 27, 2023 which has yet to post to the Trustee's website. In addition, Debtor has a payment of \$75.00 scheduled to be made through TFS on February 10, 2023. The Trustee has also issued a wage order to Debtor's employer. If Debtor is unable to bring the plan current by February 28, 2023 a Motion to Suspend the remaining default will be filed.

**WHEREFORE**, Debtor prays the Court for an order denying the Trustee's Motion to Dismiss and for such other relief as the Court deems equitable and proper.

Dated: February 8, 2023

Respectfully submitted,  
WM Law

/s/ Errin P. Stowell

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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2023, the foregoing was delivered via e-mail to the parties listed below, and parties that are registered to receive electronic filings on ECF, and regular first class, postage prepaid to the parties listed below that are not registered to receive electronic filings on ECF.

Via the Court's ECF Notice System: Richard V. Fink, Standing Chapter 13 Trustee

Dated: February 8, 2023

/s/ Errin P. Stowell